

**UNITED STATES DISTRICT COURT FOR THE  
EASTERN DISTRICT OF NEW YORK**

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9384-2557 Quebec Inc., a Canadian corporation; :  
MINEDMAP, LLC, a Nevada limited liability :  
company; and SERENITY ALPHA, INC., a Nevada :  
corporation :

1:19-CV01994-NGG-RML

**AFFIDAVIT OF ALLEN SONG  
IN SUPPORT OF  
EMERGENCY MOTION FOR  
WRIT OF REPLEVIN**

Plaintiff, :  
against :  
NORTHWAY MINING, INC., a New York :  
Corporation; MICHAEL MARANDA, an individual; :  
CSX4236 MOTORCYCLE SALVAGE, LLC, a New :  
York limited liability company; DROR SVORAI, an :  
individual; MINING POWER GROUP, INC., a :  
Florida corporation :

Defendant(s). :

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STATE OF NEVADA )  
 ) ss.  
COUNTY OF CLARK )

I, Allen Song, being of lawful age and sound mind, testifies as follows:

1. I own MinedMap, LLC (“MinedMap”), a Nevada limited liability company and Serenity Alpha, Inc., a Nevada Corporation (“Serenity Alpha”) with my business partner, Daniel Kim.
2. MinedMap and Serenity Alpha are crypto currency consulting firms. Mr. Kim and I reside in Nevada.
3. In early September 2018, Joseph Stefanelli, a broker, introduced Mr. Kim and I to Michael Maranda. Mr. Maranda represented that he owned Northway Mining. Mr. Maranda claimed that Northway Mining was involved in the bitcoin industry and had hosted, or stored, bitcoin machines and equipment for third parties.

4. On or around September 21, 2018, MinedMap and Serenity Alpha entered into a Hosting Agreement with Northway Mining, under which Northway agreed to host several of MinedMap and Serenity Alpha bitcoin mining machines ("Miners") in exchange for a fee.
5. On September 21, 2018, MINEDMAP and Serenity Alpha wired \$162,000.00 to Northway Mining. Northway was to use the \$162,000.00 for costs incurred in hosting the Miners. Costs agreed to under the Hosting Agreement included: (1) electricity bill for operating the Miners; (2) maintaining the Miners at proper temperature and ensuring the physical condition in which the Miners were stored were optimal; (3) repairs costs plus a 10% mark up; (4) internal labor Northway may incur in storing the miners; and (5) other costs directly related to storing the Miners. In total, MinedMap and Serenity Alpha transferred more than \$430,000.00 in US Currency and bitcoin to Northway Mining, based on Northway Mining's representations that it had incurred certain costs in maintaining, repairing, or otherwise hosting the Miners.
6. Michael Maranda represented that the Miners would be stored at a facility he owned located at 2 Flint Mine Road Coxsackie, New York 12051. Michael Maranda also represented that the building in which the Miners would be stored was physically conducive to storing the Miners.
7. Based on our execution of the Hosting Agreement and based on representations by Michael Maranda, MinedMap and Serenity Alpha transferred 2, 689 Miners to Northway Mining. The Miners were transferred to Northway Mining in early October 2018. Documents evidencing the transfer of the Miners to Northway Mining are attached to this Affidavit as Exhibit A and incorporated herein by this reference.
8. Around November 13, 2018, Michael Maranda stated, via text message, that he would transfer the Miners to Louisiana because electricity, which was needed to operate the Miners, was cheaper in Louisiana than in Upstate New York. Based on this representation, the Parties entered into a second Hosting Agreement.
9. However, I spoke to an individual in Louisiana to inquire about whether the Miners had been transferred to Louisiana. That individual stated that no Miners had been transferred to the hosting facility in Louisiana.
10. In addition, that individual also stated that no money had been paid to him to store the Miners.
11. When we told Michael Maranda that we had discovered that the Miners had not been stored in Louisiana, Michael Maranda backtracked: Michael Maranda claimed he was moving the Miners to a cheaper facility in Upstate New York.
12. MinedMap and Serenity Alpha allowed Michael Maranda up to and including February 15, 2019, to move the Miners to the Upstate New York location. MinedMap and Serenity Alpha indicated that if the Miners were not moved then, they would seek the immediate return of their Miners and the monies they had paid Northway Mining.

13. In addition, each and every Miner owned by MinedMap and Serenity Alpha are catalogue in a spread sheet attached to this Affidavit as Exhibit B. I represent to this Court that I personally compiled each and every Miner included in Exhibit B. Further, I represent that MinedMap and Serenity Alpha are the sole owners of the Miners included in Exhibit B and that neither Northway Mining nor its affiliates, assigns, or agents purchased the Miners that are included in Exhibit B.

14. The Miners are located at 2 Flint Mine Road Coxsackie, New York 12051.

15. Michael Maranda have been attempting to sell Miners that appear identical to the Miners owned by MinedMap and Serenity Alpha.

16. MinedMap and Serenity Alpha have formally demanded the return of their Miners, but Northway Mining and its affiliates and agents have refused to return MinedMap and Serenity Alpha's Miners.

17. Northway Mining is wrongfully withholding MinedMap and Serenity Alpha's Miners without any legal basis for doing so.

18. MinedMap and Serenity Alpha have commenced an action to recover their Miners in the District Court for the Southern District of New York. All Defendants to that action are being served.

19. MinedMap and Serenity Alpha seek an Order from this Court ordering the United States Marshall to break open, enter and search for the Miners at 2 Flint Mine Road Coxsackie, New York 12051. Sufficient probable cause exists to believe that the Miners are at 2 Flint Mine Road Coxsackie, New York 12051 because that is where they were delivered.

20. Northway Mining and the remaining Defendants do not have any colorable legal basis for maintaining possession of the Miners.

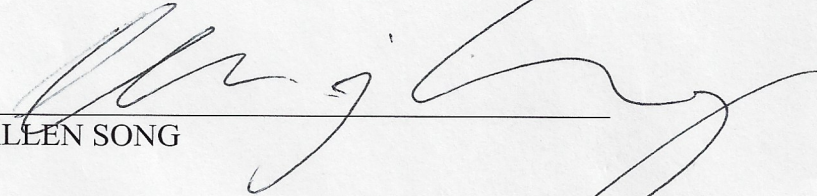
21. MinedMap and Serenity Alpha seeks an Order of Seizure without Notice because Northway Mining is in the process of transferring or selling the Miners to third parties.

22. The value of the Miners, based on current market valuation, is \$900,000.00.

[Signatures Appear on the Next Page]



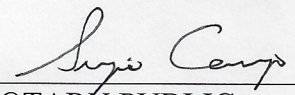
FURTHER, Affiant sayeth not.

  
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ALLEN SONG

State of Nevada  
County of Clark

  
NOTARY PUBLIC

I, the undersigned Notary Public, do hereby attest that the Affiant did appear before me this 6<sup>th</sup> day of March, 2019, and upon his oath, did affix his signature hereto.

  
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NOTARY PUBLIC

My commission expires: April, 23 2022

SEAL

